

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO: 19-04547

GIOVANNI MARIN IRIZARRY
WALESKA OLIVO SANTIAGO

CHAPTER 13

DEBTOR(S)

APPLICATION FOR COMPENSATION OF SERVICES

TO THE HONORABLE COURT:

COMES NOW, counsel for Debtor(s), and in support of this APPLICATION FOR COMPENSATION OF SERVICES very respectfully STATES, ALLEGES and PRAYS as follows:

1. On **August 9, 2019**, the Debtor commenced the instant bankruptcy case (the “Petition Date”). The Debtor(s) retained undersigned counsel (coupled, Counsel of Record”) to render legal services with respect to the above captioned matter.

2. Counsel of Record agreed to undertake the herein mentioned legal representation based on the rates in the Rule 2016 Disclosure attached hereto as **Exhibit A**. Also attached hereto as **Exhibit B** is Counsel of Record’s resume which evidences that the agreed to hourly rates charged to Debtor are consummate with the complexity of the matter at hand and the experience of the attorney assigned to the matter.

3. No agreement exists between applicant and any other entity for the sharing of compensation received or to be received for services rendered.

4. Present Counsel has handled all aspects of the case, since the preparation and filing of the voluntary petition to the various hearings on confirmation.

5. Attached hereto as **Exhibit C**, is a detailed statement of the legal services rendered by Counsel of Record through today. This is the first application for compensation filed by

Undersigned Counsel. The case at bar has not yet been confirmed. The Hearing on Confirmation is scheduled for March 26, 2020. *See*, Dk. # **31**.

6. Per the statement attached hereto, Counsel of Record has rendered \$4,850.00 in legal services and/or expenses related to the Debtor's Bankruptcy Case from the Petition Date to the Present Date.

7. As allowed by F. R. B. P. Rule 2016, Counsel of Record respectfully submits this application for compensation. Counsel of Record seeks approval of this Application in the amount of **\$4,850.00** for the services and expenses that have been rendered in this case from the Petition Date to the present date. In compliance with F.R.B.P. Rule 2016, undersigned counsel has forwarded a copy of this Fee Application to the Debtor. The funds for this compensation will come from the funds that Debtor has paid into the Chapter 13 Plan, which are held by the Trustee.

WHEREFORE, for the reasons stated above, it is respectfully requested from this Honorable Court to take knowledge of the above and approve this Application for Compensation in the amount of **\$4,850.00**.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification, upon information and belief, of such filing to the followings: The Chapter 13 Trustee, The United States Trustee and to all the CM/ECF participants of this case.

NOTICE OF OPPORTUNITY TO OBJECT PURSUANT TO LBR 9013-1(h), within twenty-one (21) days after service as evidence by the certification, and an additional three (3) days pursuant to Feb. R. Bank. P. 9006(f) if you were served by mail, and any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

RESPECTFULLY SUBMITTED

IN SAN JUAN, PUERTO RICO, this 11th day of February of 2020.

THE BATISTA LAW GROUP, PSC

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/s/ Jesus E. Batista Sanchez, Esq.